

## Message

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**Sent:** 10/26/2015 2:20:34 PM  
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**Subject:** (026102034) Kalproject Public Comments

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Comments on Proposed Plan Allied Landfill Superfund Site  
 OU-1 September 2015

1. I have been Project Manager on several NPL Superfund Sites. These include Aritic Surplus, Yellow Water Road, Standard Steel. These sites required stabilization and solidification of PCB soils that were placed into monoliths and left on site. I have over 30 years of Superfund experience. I live in the Kalamazoo River watershed. I am also CHMM and CPG.

2. USEPA does it again and publishes a 64 page document on the proposed plan with no Table of Contents. Why I don't know? It sure does the document difficult for the public to review.

3. USEPA preferred remedy 2D makes several misrepresentations or let us call them omissions. One is about commercial TSDFs that can accept PCB soils. USEPA knows that Wayne Disposal in Belleville, MI can accept PCB soils for disposal and is less than 2 hours from the site. As a matter of fact Wayne Disposal is the only facility in EPA Region 5 that can accept PCB soils. I am not sure how USEPA left out that little fact part of their proposed plan. Second USEPA knows full well that if PCB soils are left on-site in the proposed landfill, monitoring will go on FOREVER! There will be biannual inspections to check monitoring wells and to check for erosion on the landfill. Great for the consulting firm that gets to charge \$30,000 per year to do these inspections, not so great for the local community. In addition USEPA knows that around the 41 high monolith there will always be a chain link fence with warning signs about the PCB soils. Not a good thing to see if live near the site.

2. We know that Section 121 of CERCLA prefers on-site treatment of wastes and that is why USEPA chose remedy 2D. However the community has suffered for years because of the wastes left behind by the paper industries. Also the community near the Allied Landfill is low income and minority. I saw no mention of Environmental Justice issues in the proposed plan. Community outreach, yes, but I feel in this case and site USEPA could use Wayne Disposal for PCB soil removal and there would no need for long term monitoring at the site (groundwater monitoring would be reduced or eliminated in the future if the source was removed). This would result a site that could be reused by Kalamazoo with fewer restrictions.

2. I object to the idea of using 1600 feet of sheet pile wall. Will this be a unsightly wall that will be in place forever. If needed can USEPA make it as aesthetically pleasing for the local community? Between the sheet pile wall and a chain link fence with warning signs will look worse than the site current condition.

3. I object to have a soil monolith that will tower up to 41 feet over the local residents. If needed can USEPA lower the profile or height? A lower profile will reduce slope angles and less

erosion, thereby reducing future O&M costs. Also a lower profile might result in some sort of future use. A high profile will result in no future uses. That has been my experience on implementing soil monoliths on Superfund sites.

4. Once again USEPA choses a remedy in the State of Michigan where there are no Uniform Environmental Covenants Act (UECA) in place. This will result in, that future land use restrictions are not adhered too. Without UECA laws in place, jeopardizes that future real estate transactions will not follow any deed restrictions. The UECA makes it clear on how restrictions will remain in effect.

5. I fully understand why USEPA and the PRPs prefer remedy 2D. I believe that best option for local community would be remedy 3, because it reduces or eliminates future requirement at the site, would result in a greater chance of reuse of the property, would help increase property values in the local area.

Thank you for considering my comments. The USEPA is a very useful Federal government organization and is making great progress on cleaning up the Kalamazoo River Superfund Site. Thank you again for your service to residents living in the Kalamazoo watershed!

Sincerely,

Mr. Bruce Noble, CPG, CHMM

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